

1 PAUL J. PASCUZZI, State Bar No. 148810
JASON E. RIOS, State Bar No. 190086
2 THOMAS R. PHINNEY, State Bar No. 159435
FELDERSTEIN FITZGERALD
3 WILLOUGHBY PASCUZZI & RIOS LLP
500 Capitol Mall, Suite 2250
4 Sacramento, CA 95814
Telephone: (916) 329-7400
5 Facsimile: (916) 329-7435
Email: ppascuzzi@ffwplaw.com
6 jrios@ffwplaw.com
tphinney@ffwplaw.com

7
8 ORI KATZ, State Bar No. 209561
ALAN H. MARTIN, State Bar No. 132301
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
9 A Limited Liability Partnership
Including Professional Corporations
10 Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
11 Telephone: (415) 434-9100
Facsimile: (415) 434-3947
12 Email: okatz@sheppardmullin.com
amartin@sheppardmullin.com

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14 Attorneys for The Roman Catholic Archbishop of
San Francisco

15 UNITED STATES BANKRUPTCY COURT
16
17 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

18 In re
19 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,
20
21 Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**DECLARATION OF BARRON L.
WEINSTEIN IN SUPPORT OF FIRST
INTERIM APPLICATION OF
WEINSTEIN & NUMBERS, LLP FOR
ALLOWANCE OF FEES AND
REIMBURSEMENT OF EXPENSES AS
SPECIAL INSURANCE COUNSEL FOR
THE DEBTOR IN POSSESSION**

Date: April 4, 2024
Time: 1:30 p.m.
Location: Via ZoomGov
Judge: Hon. Dennis Montali

1 I, Barron L. Weinstein, declare:

2 1. I am an attorney duly licensed to practice law in the State of California and a partner
3 with Weinstein & Numbers, LLP ("W&N"), special corporate and insurance counsel for The
4 Roman Catholic Archbishop of San Francisco, a California corporation sole, the debtor and debtor
5 in possession herein (the "Debtor"). If called as a witness, I would and could testify competently
6 to the matters stated herein.

7 2. I am a partner of W&N. As such, I have personal knowledge of my firm's billing
8 policies and practices. I have read the accompanying First Interim Application of Weinstein &
9 Numbers, LLP, for Allowance of Fees and Reimbursement of Expenses (the "Application"), and
10 to the best of my knowledge, all statements are true and correct.

11 3. During the approximately five-and-a-half-month period of August 21, 2023, through
12 and including January 31, 2024, (the "Application Period"), W&N billed the Debtor for legal
13 services in the sum of \$95,475.50. The services performed by W&N during this case have been
14 specific to its role as special insurance counsel to the Debtor.

15 4. The detailed billing statements reflecting W&N's time records is attached hereto as
16 **Exhibit A** and reflects total fees in the amount of \$95,475.50 incurred during the Application
17 Period. A breakdown of the professionals who billed to this case during the Application Period is
18 as follows:

CATEGORY	HOURS	FEES
Asset Analysis and Recovery	3.80	\$1,615.00
Discovery	8.80	\$4,700.00
Employment Applications	7.60	\$3,297.50
Fee Applications	1.90	\$399.00
Litigation	246.30	\$71,170.00
Mediation	3.20	\$2,000.00
Motion Practice	17.50	10,813.00
Preparation of Materials for Parties in Bankruptcy Proceedings	4.80	\$1,481.00
Totals	293.90	\$95,475.50

Case No. 23-30564

DECLARATION IN SUPPORT OF W&N FIRST

INTERIM APPLICATION FOR ALLOWANCE OF FEES

1 5. I have used my best billing judgment to allocate the services covered by this interim
2 fee application to task categories listed above. I will continue to do so going forward on all W&N
3 monthly fee notices and interim fee applications. A brief description of the type of services
4 contained in each category is as follows:

5 a. The “Asset Analysis and Recovery” task code was used for identification
6 and review of potential assets including causes of action and non-litigation recoveries.

7 b. The “Discovery” task code was used for matters relating to analysis and
8 communications regarding Committee production requests.

9 c. The “Employment Applications” task code was used for matters relating to
10 review and preparation of correspondence regarding application for employment, finalize
11 application and declaration, telephone conference with counsel regarding employment application.

12 d. The “Fee Applications” task code was used for matters relating to reviewing
13 correspondence from Mr. Pascuzzi regarding request for billing, payment, retainer balance details,
14 prepare spreadsheet regarding same, review monthly fee notice and confirm billing details and
15 breakdown for billing entries.

16 e. The “Litigation” task code was used for matters relating to the review of
17 each abuse claim to determine which insurance policies might apply, preparation of correspondence
18 tendering each claim to each carrier with potential coverage, maintaining charts of all tenders and
19 responses, maintaining charts of identifying information for each abuse claim as necessary to
20 pursue coverage, conferencing with insurance adjusters and coverage counsel to address questions
21 and requests for information, and collaborating with defense and bankruptcy counsel to coordinate
22 the insurance coverage issues with ongoing defense and bankruptcy issues.

23 f. The “Mediation” task code was used for matters related to the review of
24 correspondence regarding mediation strategy, prepare correspondence regarding mediation, attend
25 Zoom meeting regarding issues of mediation and overall strategy with counsel and client, numerous
26 telephone conferences regarding mediation.

27 g. The “Motion Practice” task code was used for matters related to attending
28 Zoom meetings with counsel and client to discuss hearing on pending motions, review pleadings

1 and file notes to prepare for hearing, attend hearing via Zoom, review pleadings regarding state
2 court coverage action, telephone conference with counsel regarding same.

3 h. The "Preparation of Materials for Parties in Bankruptcy Proceedings" task
4 code was used for matters related to review of correspondence from bankruptcy counsel regarding
5 requests from Committee and prepare response, analysis of policies and secondary evidence for
6 production to bankruptcy counsel, review of complaint, evaluate coverage and prepare tender letter
7 to carrier, conferencing with Committee counsel and preparing information for them regarding the
8 Debtor's coverage.

9 6. During the Application Period, W&N incurred actual and necessary expenses in the
10 amount of \$64.07 as follows:

Category	Total
Court Fees	\$48.57
Document management	\$15.50
Total Expenses	\$64.07

15 7. This is Counsel's first interim fee motion, so no previous fee motions have been
16 filed.

17 8. With respect to the Bankruptcy Rule 2016(a) requirements for attorney fee
18 applications, W&N has not received any payments to date in this case from any source after the
19 Petition Date. On the Petition Date, Counsel held a retainer totaling \$136,133.00. The balance of
20 the retainer as of January 31, 2024, is \$76,220.93, after payment of 80% of fees and 100% of
21 expenses for August through December fee notices.

22 9. With respect to Bankruptcy Rule 2016(b), W&N has not entered into any agreement,
23 express or implied, with any other party-in-interest, including the Debtor, any creditors, or any
24 representative of them, or with any attorney or accountant for such party-in-interest for the purpose
25 of fixing fees or other compensation to be paid for services rendered or expenses incurred in
26 connection with this case, and no agreement or understanding exists between me and any other
27 person for the sharing of the compensation to be received for services rendered in, or in connection
28 with, this case.

1 10. I certify that to the best of my knowledge W&N has complied with the U.S.
2 Trustee's guidelines ("U.S. Trustee Guidelines").

3 11. I certify that: (a) I have read the Application; (b) to the best of my knowledge,
4 information and belief, formed after reasonable inquiry, the compensation and expense
5 reimbursement sought is in conformity with the Court Guidelines, except as may be specifically
6 noted in the Application or this Declaration; and (c) the compensation and expense reimbursement
7 requested are billed at rates, in accordance with practices, no less favorable than those customarily
8 employed by my firm and generally accepted by the my firm's clients.

9 12. In accordance with UST Guidelines for Large Cases, W&N prepared budgets and
10 staffing plans for the period during the application which were reviewed with and approved by the
11 Debtor.

12 13. As required by the UST Large Case guidelines, W&N provides the following:

13 a. W&N did not agree to any variations from, or alternatives to, its standard or
14 customary billing rates, fees or terms for services pertaining to this engagement that were provided
15 during the application period.

16 b. If the fees sought in this fee application as compared to the fees budgeted for
17 the time period covered by this fee application are higher by 10% or more, did you discuss the
18 reasons for the variation with the client? No, the fees requested were substantially under the fees
19 budgeted for the time period.

20 c. Have any of the professionals included in this fee application varied their
21 hourly rate based on the geographic location of the bankruptcy case? No.

22 d. Does the fee application include time or fees related to reviewing or revising
23 time records or preparing, reviewing, or revising invoices? No.

24 e. Does this fee application include time or fees for reviewing time records to
25 redact any privileged or other confidential information? No.

26 f. The fee application does not include any rate increases since retention.
27 W&N hourly rates were adjusted effective February 2024 by the filing of an appropriate notice at
28 ECF 425.

1 14. I respectfully submit that all the billings and expenses have been reasonable and
2 necessary in this case and respectfully request that they be approved.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed on
4 February 26, 2024, at Larkspur, California.

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6 /s/ BARRON L. WEINSTEIN

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Exhibit A

August 21, 2023 through January 31, 2024

Billing Statements

**Weinstein
&
Numbers, LLP**
Attorneys at Law

115 Ward Street
Larkspur, CA 94939

415-927-6920
www.mwncov.com

INVOICE # 33721
Date: 08/31/2023

Archdiocese of San Francisco
Paula Carney
carneyp@sfarch.org
Philip Lam
lamp@sfarch.org
One Peter Yorke Way
San Francisco, California 94109

AB 218 Claims

Current Services	Attorney		Hours	Total
08/21/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review files and prepare correspondence regarding bankruptcy filing (35 min); telephone conferences regarding carrier request for waiver of conflict (30 min).	1.10	\$687.50
08/21/2023	CDY	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review complaints and related claim documents filed for multiple claimants (.2); update file regarding same (.1); review file and prepare materials for filing of stay (.3).	0.60	\$126.00
08/21/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of correspondence from counsel for carrier concerning bankruptcy (.1) analyze correspondence from carriers re claims (.4) prepare correspondence and documents for carriers concerning bellwether cases (.2) review of voluntary bankruptcy petition and discuss with Weinstein (.1)	0.80	\$340.00
08/21/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Prepare draft notice of stay regarding bankruptcy proceedings for filing in Chubb v. RCASF action (1.0).	1.00	\$350.00
08/21/2023	CDY	Employment Application: Conflicts check regarding bankruptcy proceeding (.6); review file and send memo re final, fully-executed conflict waiver (.2).	0.80	\$168.00

08/22/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review file regarding bankruptcy stay; finalize Notice of Stay for coverage action.	0.50	\$312.50
08/22/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Prepare correspondence regarding insufficient disk space in system to file carrier correspondence.	0.20	\$42.00
08/22/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze draft notice of stay and notice filed in JCCP 5108 (0.3); revise draft notice (0.3); coordinate filing of notice with CY (0.3).	0.90	\$315.00
08/23/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Telephone conference with counsel regarding strategy for settlement discussions (10 min); review and prepare correspondence regarding Chubb coverage litigation (10 min).	0.40	\$250.00
08/23/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new correspondences and claim number received prepare correspondences regarding the same.	0.70	\$147.00
08/23/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze pleadings and coverage chart (0.2); review, analyze, and revise tender/notice correspondence to carriers (0.3); finalize tender letters and send to carriers (0.2).	0.70	\$245.00
08/23/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze defense counsel invoices submitted to client for payment for July 2023 (1.1); prepare updates to reimbursement spreadsheet with new invoice information (.7).	1.80	\$567.00
08/24/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new correspondences and tenders and prepare correspondences regarding the same (.2). Update tender matrix claimant entry and tender matrix table of contents, update coverage chart claimant entry, and prepare correspondence regarding all (.2).	0.50	\$105.00
08/24/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and prepare correspondence regarding carrier's reimbursement of past fees and costs.	0.30	\$187.50
08/25/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and file, chart new carrier correspondence to 103 claimants and prepare correspondence regarding the same.	2.80	\$588.00
08/28/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and prepare correspondence with insurance adjuster regarding tender with request for information.	0.20	\$85.00
08/28/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze notice of stay and clerk's email, and confer with CY regarding refiling of notice of stay (0.2).	0.20	\$70.00

08/29/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart correspondences and prepare correspondences regarding the same.	0.50	\$105.00
08/29/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Analyze notice of adoption forms for multiple claimants and prepare correspondence to carriers (.4) review of correspondence from defense counsel regarding coverage and requests for information concerning 11 claims (.2) analyze five claims and prepare correspondence to defense counsel (.3) analyze coverage letter from carrier and prepare correspondence to carrier regarding coverage position (.2) review of correspondence from defense counsel re coverage (.2)	1.30	\$552.50
08/29/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze defense counsel invoices submitted to client for payment (2.3); prepare updates to reimbursement spreadsheet with new invoice information (1.4).	3.70	\$1,165.50
08/30/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart carrier correspondence and prepare correspondence regarding the same.	0.20	\$42.00
08/30/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart correspondences and new tender and update tender matrix carrier data and update tender matrix to reflect new data provided in tender and prepare correspondences regarding all.	0.30	\$63.00
08/30/2023	BLW	Employment Application: Review and revise draft application for employment;	2.00	\$1,250.00
08/30/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review various correspondence from defense counsel regarding insurer reimbursement for fees and costs (.3) review of correspondence from defense counsel regarding coverage by multiple carriers for claims and claims with shared coverage (.2) analyze file regarding overlapping policy periods (.3) prepare response to defense counsel re claims with overlapping policy periods and coverage position of carriers (.5) evaluate potential coverage for claimant and prepare correspondence to adjuster regarding adoption of master complaint (.3) analyze new fact sheet from claimant and evaluate scope of claim (.2) analyze potential additional coverage for claim and prepare new tender letter to carrier (.4).	2.20	\$935.00
Services Subtotal				\$8,698.50

Current Services			Total
08/22/2023	Filing fees and service fees regarding Notice of Stay for Century Indemnity et al. v. RCASF action.		\$48.57
Expenses Subtotal			\$48.57

Time Keeper	Hours	Rate	Total
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Kevin Cifarelli	4.5	\$425.00	\$1,912.50
Adison Marshall	2.8	\$350.00	\$980.00
Barry Weinstein	4.3	\$625.00	\$2,687.50
Brian Carolus	5.2	\$210.00	\$1,092.00
Bob Patterson	5.5	\$315.00	\$1,732.50
Chuck Yeo	1.4	\$210.00	\$294.00
Subtotal			\$8,747.07
Total This Invoice			\$8,747.07

**Weinstein
&
Numbers, LLP**
Attorneys at Law

115 Ward Street
Larkspur, CA 94939

415-927-6920
www.mwncov.com

INVOICE # 33725
Date: 09/30/2023

Archdiocese of San Francisco
Paula Carney
carneyp@sfarch.org
Philip Lam
lamp@sfarch.org
One Peter Yorke Way
San Francisco, California 94109

AB 218 Claims

Current Services	Attorney		Hours	Total
09/01/2023	BLW	Employment Application: Prepare application for employment in bankruptcy proceedings and related documents.	1.40	\$875.00
09/01/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze defense counsel invoices submitted to client for payment (2.2); prepare updates to reimbursement spreadsheet with new invoice information (.9).	3.10	\$976.50
09/01/2023	CDY	Employment Application: File review regarding bankruptcy application (.2); drafting of application (.6); review and check extensive list for conflicts of interest (1.6).	2.20	\$462.00
09/02/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze defense counsel invoices submitted to client for payment (1.1); prepare updates to reimbursement spreadsheet with new invoice information (.6).	1.70	\$535.50
09/03/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and prepare correspondence regarding bankruptcy issues.	0.50	\$312.50
09/04/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze additional defense counsel invoices (1.8); prepare additions and edits to reimbursement chart for use by attorney in connection with reimbursement of paid invoices from carriers (.9).	2.70	\$850.50

09/06/2023	BLW	Employment Application: Review and prepare correspondence regarding application for employment as debtor's insurance counsel (20 min); finalize application and declaration for filing (10 min); telephone conference with counsel regarding same (10 min).	0.70	\$437.50
09/08/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze additional defense counsel invoices (1.7); prepare additions and edits to reimbursement chart for use by attorney in connection with reimbursement of paid invoices from carriers (1.4).	3.10	\$976.50
09/09/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze additional defense counsel invoices (1.4); prepare additions and edits to reimbursement chart for use by attorney in connection with reimbursement of paid invoices from carriers (.7).	2.10	\$661.50
09/10/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze additional defense counsel invoices (.6); prepare additions and edits to reimbursement chart for use by attorney in connection with reimbursement of paid invoices from carriers (.7).	1.30	\$409.50
09/12/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of three letters from excess carrier concerning coverage and requests for information (.9) review of file and prepare response to carrier request for information. (.5)	1.40	\$595.00
09/13/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of correspondence from counsel regarding litigation.	0.10	\$42.50
09/14/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new carrier correspondences received.	0.40	\$84.00
09/14/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Analyze four coverage letters from carrier in response to tenders, evaluate requests for information and prepare responses.	0.60	\$255.00
09/15/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new carrier correspondence received.	0.20	\$42.00
09/18/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Conference meeting regarding upcoming mediation, Tender Reconciliation List, tender matrix entries, and claimants for whom pleadings are currently missing (.75). Prepare a list of claimants for whom pleadings are currently missing from our system records (.4). Review new claimant excel matrix chart received and expand out 528 compressed rows for visibility (.4).	1.60	\$336.00
09/18/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Conduct file review of 78 claims to determine pleadings and discovery served by claimants (2.7); prepare memorandum regarding claims (.5).	3.20	\$1,360.00
09/18/2023	CDY	Employment Application: File review and analysis regarding data on application for employment.	0.50	\$105.00

09/19/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review new claimant excel matrix chart received and expand 528 compressed rows for visibility (.5). Review new claimant excel matrix and merge duplicate claimant folders and update claimant folder titles and update tender matrix entries and tender matrix table of contents and update coverage chart entries and create new claimant folders and create new tender matrix claimant entries and create new coverage chart claimant entries (2.6).	3.20	\$672.00
09/19/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Telephone conference with Paul Gaspari and review correspondence regarding possible retention of expert.	0.20	\$125.00
09/21/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate large collection of claimant documents into network system folders (2.7); prepare comprehensive spreadsheet, identifying missing pleadings, documents, and other data related to each claimant (1.6).	4.30	\$1,354.50
09/23/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze additional defense counsel invoices (1.7); prepare additions and edits to reimbursement chart for use by attorney in connection with reimbursement of paid invoices from carriers (2.1).	3.80	\$1,197.00
09/25/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of correspondence from excess carrier's adjuster re coverage issues raised, and request for information by carrier.	0.60	\$255.00
09/25/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of multiple letters from carrier and analyze coverage position and respond to request for information.	0.60	\$255.00
09/27/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and incorporate additional plaintiff fact sheets and notices of adoption into claimant folders.	2.30	\$724.50
09/27/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Analyze three separate reservation of rights letters from carriers regarding coverage position with requests for informations (.9) prepare responses to request for information to carrier (.5)	1.40	\$595.00
09/28/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and file new carrier correspondences.	0.60	\$126.00
09/29/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review new plaintiff excel matrix and update claimant folder titles (1.1); update tender matrix entries and tender matrix table of contents (.7); update coverage chart entries and create new claimant folders (1.2); create new tender matrix claimant entries and create new coverage chart claimant entries (.4).	3.40	\$714.00
09/29/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze Weintraub Tobin claims list (.5); review and analyze our claims list and update to reflect	1.10	\$385.00

date and carrier correspondence (.4); review and analyze carrier correspondence and pleadings to update claims list chart (.2).

09/30/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review new plaintiff excel matrix and merge duplicate claimants and update claimant folder titles (2.5); update tender matrix entries and tender matrix table of contents (.5); update coverage chart entries and create new claimant folders (2.7); and create new tender matrix claimant entries and create new coverage chart claimant entries (1.8).	7.50	\$1,575.00
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Time Keeper	Hours	Rate	Total
Kevin Cifarelli	7.9	\$425.00	\$3,357.50
Adison Marshall	1.1	\$350.00	\$385.00
Barry Weinstein	2.8	\$625.00	\$1,750.00
Brian Carolus	16.9	\$210.00	\$3,549.00
Bob Patterson	24.4	\$315.00	\$7,686.00
Chuck Yeo	2.7	\$210.00	\$567.00
Subtotal			\$17,294.50
Total This Invoice			\$17,294.50

**Weinstein
&
Numbers, LLP**
Attorneys at Law

115 Ward Street
Larkspur, CA 94939

415-927-6920
www.mwncov.com

INVOICE # 33775
Date: 11/14/2023

Archdiocese of San Francisco
Paula Carney
carneyp@sfarch.org
Philip Lam
lamp@sfarch.org
One Peter Yorke Way
San Francisco, California 94109

AB 218 Claims

Current Services	Attorney		Hours	Total
10/02/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review new plaintiff excel matrix and update claimant folder titles and update tender matrix entries and tender matrix table of contents and update coverage chart entries and create new claimant folders and create new tender matrix claimant entries and create new coverage chart claimant entries (2.1). Zoom conference regarding new billing practices and upcoming mediation (.7).	2.80	\$588.00
10/02/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review files and meet with team regarding status and preparation for mediation.	0.30	\$187.50
10/02/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze pleadings, carrier correspondence, coverage chart, and tender reconciliation in order to prepare outgoing tenders.	0.90	\$315.00
10/06/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new carrier correspondence and claim number received (.1). Review claimant folder and tender matrix claimant entry (.1). Create new claimant folders, create new tender matrix claimant entries and update tender matrix table of contents, create new coverage chart claimant entries, and prepare correspondence regarding all (.3).	0.50	\$105.00

10/06/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Analyze coverage letter from Lloyd's and summary of policies from Lloyd's in response to [REDACTED] claim.	0.40	\$170.00
10/09/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review new plaintiff excel matrix and update claimant folder titles, tender matrix, and coverage chart claimant entries.	1.20	\$252.00
10/11/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Create new folder (.1). Review all tender matrix volumes and identify, highlight carrier denials for coverage denials identification project (1.6). Update tender matrix carrier data (.3).	2.10	\$441.00
10/11/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and prepare correspondence regarding status of bankruptcy proceedings and new coverage counsel for Committee.	0.30	\$187.50
10/12/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review all tender matrix volumes and identify, highlight carrier denials for coverage denials identification project (4.8). Update tender matrix carrier data (.5). Review claimant folder and tender matrix claimant entry (.1).	5.40	\$1,134.00
10/13/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review all tender matrix volumes and identify, highlight carrier denials for coverage denials identification project (4.7). Update tender matrix claimant and carrier data (1.2).	5.90	\$1,239.00
10/18/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of multiple emails and correspondence from defense counsel and counsel for carriers regarding claims notice procedure.	0.30	\$127.50
10/23/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Analyze correspondence from Chubb in response to four tenders of claims and analyze coverage issues.	0.40	\$170.00
10/27/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review excel matrix and update claimant folder titles, tender matrix, and coverage chart.	4.10	\$861.00
10/30/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Telephone conferences with counsel regarding motions for relief from stay (1.2); review pleadings regarding same (.7).	1.70	\$1,062.50
10/30/2023	KLC	Asset Analysis and Recovery (Insurance Proceeds): Review of correspondence from bankruptcy counsel, carrier counsel and Committee Counsel re claims procedures motion and motion for relief from stay and fee examination.	0.30	\$127.50

Time Keeper	Hours	Rate	Total
Kevin Cifarelli	1.4	\$425.00	\$595.00
Adison Marshall	0.9	\$350.00	\$315.00

Barry Weinstein	2.3	\$625.00	\$1,437.50
Brian Carolus	22.0	\$210.00	\$4,620.00
Subtotal			\$6,967.50
Total This Invoice			\$6,967.50

**Weinstein
&
Numbers, LLP**
Attorneys at Law

115 Ward Street
Larkspur, CA 94939

415-927-6920
www.mwncov.com

INVOICE # 33800
Date: 12/01/2023

Archdiocese of San Francisco
Paula Carney
carneyp@sfarch.org
Philip Lam
lamp@sfarch.org
One Peter Yorke Way
San Francisco, California 94109

AB 218 Claims

Current Services	Attorney		Hours	Total
11/01/2023	BLW	Review file notes and correspondence to prepare for Zoom meeting with counsel (.4); attend Zoom meeting with counsel to discuss pending motions (1.2)	1.60	\$1,000.00
11/02/2023	BLW	Review correspondence regarding mediation strategy (.5); prepare correspondence regarding same (.3); Attend Zoom meeting regarding issues of relief from stay motions, mediation and overall strategy with counsel and client (1.0); telephone conferences with carrier and Committee counsel regarding relief from stay and claim process (1.0).	2.80	\$1,750.00
11/03/2023	BSC	Review All Dioceses excel matrix and update claimant folder titles (.5); update tender matrix claimant entries and tender matrix table of contents (.3); and update coverage chart entries (.3).	1.10	\$231.00
11/06/2023	BLW	Review correspondence regarding discovery issues (.5); prepare correspondence regarding same (.2); review Rule 2004 Application and discuss with counsel (.5) and discuss with counsel (.3).	1.50	\$937.50
11/07/2023	KLC	Analyze claims made to National Catholic Insurance to evaluate decrease in coverage from new claim and motion for relief from stay (.4) analyze National Catholic policies re scope of coverage (.3)	0.70	\$297.50
11/07/2023	BLW	Attend Zoom meeting with counsel to discuss discovery issues (1.3); review 2004 application regarding production of insurance	2.50	\$1,562.50

		information (.7); review file notes and correspondence regarding same (.5).		
11/08/2023	BLW	Review and prepare correspondence regarding motion for relief from stay (.7); Telephone conference with Committee Counsel regarding pending motions (.9); Telephone conference with co-counsel regarding same (.3).	1.90	\$1,187.50
11/09/2023	BLW	Attend Zoom meeting with counsel and client to discuss hearing on pending motions (.6); Review pleadings and file notes to prepare for hearing (1.0); attend hearing via Zoom (2.5).	4.10	\$2,562.50
11/13/2023	BLW	Telephone conference with counsel regarding claim procedures (.2); review correspondence regarding opposition to motion for relief from stay (.2); review opposition to motion (.2).	0.60	\$375.00
11/14/2023	BLW	Telephone conferences with counsel regarding claim procedures and supplemental questionnaire (.7); review correspondence and draft pleadings regarding same (1.3).	2.00	\$1,250.00
11/17/2023	RP	Review, analyze, and incorporate additional defense counsel invoices provided by defense counsel (1.7); prepare additions and edits to global spreadsheet, outlining all defense fees and costs for accepted claims (2.1).	3.80	\$1,197.00
11/20/2023	CDY	Review memo from Mr. Pascuzzi regarding request for billing/ payment/retainer balance details (.2); prepare spreadsheet re same (.6); review Fee Notice and confirm billing details and breakdown for October billing entries (.3).	1.10	\$231.00
11/21/2023	RP	Review, analyze, and incorporate additional defense counsel invoices produced by defense counsel related to accepted claims (1.3); prepare edits and additions to global spreadsheet, outlining all fees and costs for global activity and claimant activities to date (1.9).	3.20	\$1,008.00
11/22/2023	RP	Review, analyze, and incorporate additional defense counsel invoices produced by defense counsel related to accepted claims (1.3); prepare edits and additions to global spreadsheet, outlining all fees and costs for global activity and claimant activities to date (1.3).	3.60	\$1,134.00
11/27/2023	KLC	Review of correspondence from bankruptcy counsel regarding requests from Committee and prepare response (.3) analysis of policies and secondary evidence for production to bankruptcy counsel (.6) review of complaint, evaluate coverage and prepare tender letter to carrier (.6)	1.50	\$637.50
11/27/2023	CDY	Collate additional policy documents and organize DropBox regarding same.	0.30	\$63.00
11/27/2023	RP	Review, analyze, and incorporate additional defense counsel invoices produced by defense counsel related to accepted claims (1.1); prepare edits and additions to global spreadsheet, outlining all fees and costs for global activity and claimant activities to date (.7).	1.80	\$567.00
11/28/2023	BSC	Organize claimant folder (.1). Review and chart new tender and prepare correspondence regarding the same (.2).	0.40	\$84.00
11/28/2023	RP	Review, analyze, and incorporate additional defense counsel	2.30	\$724.50

		invoices produced by defense counsel related to accepted claims (1.3); prepare edits and additions to global spreadsheet, outlining all fees and costs for global activity and claimant activities to date (1.0).		
11/29/2023	BSC	Review Master Diocese excel matrix and update claimant folder titles and tender matrix claimant entries (2.3); update tender matrix table of contents and coverage chart entries (1.6).	3.90	\$819.00
11/30/2023	BSC	Review Master Diocese excel matrix and update claimant folder titles and tender matrix claimant entries (3.8); update tender matrix table of contents and coverage chart entries (2.3).	6.10	\$1,281.00
11/30/2023	KLC	Review of correspondence from carrier counsel regarding insurance policies and analyze policies for production (.4) analyze redacted portions of policies and prepare for production (.3)	0.70	\$297.50
11/30/2023	CDY	Review original policy production; collate and review policy documents for production of unredacted and secondary evidence documents; Bates stamp and create a shared data link for policy docs; teleconference with A. Cottrell regarding same.	2.60	\$546.00

Time Keeper	Hours	Rate	Total
Kevin Cifarelli	2.9	\$425.00	\$1,232.50
Barry Weinstein	17.0	\$625.00	\$10,625.00
Brian Carolus	11.5	\$210.00	\$2,415.00
Bob Patterson	14.7	\$315.00	\$4,630.50
Chuck Yeo	4.0	\$210.00	\$840.00
		Subtotal	\$19,743.00
		Total This Invoice	\$19,743.00

Detailed Statement of Account

Past Due Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
33721	11/23/2023	\$8,747.07	\$7,007.37	\$1,739.70
33725	11/23/2023	\$17,294.50	\$13,835.60	\$3,458.90
33775	12/14/2023	\$6,967.50	\$0.00	\$6,967.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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33800	12/31/2023	\$19,743.00	\$0.00	\$19,743.00
				Total for This Matter
				\$31,909.10
				Total Amount Due
				\$31,909.10

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INVOICE # 33844
Date: 01/08/2024

Archdiocese of San Francisco
Paula Carney
carneyp@sfarch.org
Philip Lam
lamp@sfarch.org
One Peter Yorke Way
San Francisco, California 94109

AB 218 Claims

Current Services	Attorney		Hours	Total
12/01/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review All Dioceses excel matrix and update claimant folder titles and update tender matrix claimant entries and tender matrix table of contents and update coverage chart entries.	2.50	\$525.00
12/04/2023	BLW	Motion Practice: Review and prepare correspondence regarding motion to release stay (.3); review file regarding status of tenders (.2).	0.50	\$312.50
12/04/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Download Master Dioceses excel matrix and coverage chart and tender matrix volumes 1-6 to remote work computer (.1). Review Master Dioceses excel matrix and update tender matrix claimant entries (1.3), update tender matrix table of contents (1.1), Review Master Dioceses excel matrix and update coverage chart entries (1.2).	3.70	\$777.00
12/04/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate additional invoices received from defense counsel (1.4); prepare and chart additional invoices to carriers in connection with accepted claims (.9).	2.30	\$724.50
12/04/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available	0.40	\$170.00

		Insurance Coverage): Review of correspondence from defense counsel regarding bankruptcy and coverage issues and analyze file to prepare response.		
12/05/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Upload coverage chart and all 6 tender matrix volumes to Dropbox and download, save all to local office server (.2). Review Master Dioceses excel matrix and update tender matrix claimant entries (1.375). Update tender matrix table of contents (1.375). Review Master Dioceses excel matrix and update claimant folder titles (1.375). Review Master Dioceses excel matrix and update coverage chart entries (1.375).	5.80	\$1,218.00
12/05/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate additional invoices received from defense counsel (1.3); prepare and chart additional invoices to carriers in connection with accepted claims (.8).	2.10	\$661.50
12/05/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Analyze correspondence from defense counsel, bankruptcy counsel and coverage counsel regarding litigation issues in bankruptcy.	0.20	\$85.00
12/06/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review Master Dioceses excel matrix and update tender matrix claimant entries (1.5969). Update tender matrix table of contents (1.5969). Review Master Dioceses excel matrix and update claimant folder titles (1.8151). Review Master Dioceses excel matrix and update coverage chart entries (1.5969). Create new coverage chart entry (.1).	6.80	\$1,428.00
12/06/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze carrier correspondence, pleadings, and files to determine if any outstanding tenders, missing responses, or missing pleadings in preparation for mediation (1.4); review and analyze weintraub tobin charts regarding claims (0.7).	2.10	\$735.00
12/06/2023	CDY	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review CMO and update litigation calendar regarding continuation of 12/27/23 CMC.	0.30	\$63.00
12/07/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review coverage chart and update claimant folder titles (1.7183). Update coverage chart claimant entries (.2).	2.00	\$420.00
12/07/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze carrier correspondence, pleadings, and files to determine if any outstanding tenders, missing responses, or missing pleadings in preparation for mediation (4.5).	4.50	\$1,575.00
12/08/2023	KLC	Discovery: Analyze policies and secondary evidence for production.	1.70	\$722.50
12/08/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze carrier correspondence, pleadings, and files to determine if any outstanding tenders, missing responses, or missing pleadings in preparation for mediation (1.5).	1.50	\$525.00

12/08/2023	CDY	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review file and prepare for production of secondary policy evidence.	0.40	\$84.00
12/09/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate additional claims received from defense counsel (1.4); prepare and draft additional tender notices to carriers in connection with additional claims (1.2).	2.60	\$819.00
12/11/2023	KLC	Discovery: Continue analysis of policies for production to Committee Counsel (1.6) revise tender letters to Allianz, Travelers, Chubb and Hartford and prepare Dropbox folders for carriers (.7)	2.30	\$977.50
12/11/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new tenders (.3). Update tender matrix carrier data and update tender matrix table of contents (.2) Update coverage chart claimant entry (.1).	0.50	\$105.00
12/12/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of correspondence from carrier regarding new claim and respond to request for information.	0.60	\$255.00
12/13/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new tenders.	0.30	\$63.00
12/13/2023	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Attend Zoom meeting with Ori Katz and Committee counsel regarding strategy as to insurers (.7); telephone conference with Ori Katz regarding same (.2); review insurance documents for production to Committee (1.4)	2.30	\$1,437.50
12/13/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate additional invoices from defense counsel for recent defense work on claims (.4); prepare updates to reimbursement spreadsheets, outlining invoices and requests for reimbursement (1.3).	1.70	\$535.50
12/13/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze carrier correspondence, pleadings, and files to determine if any outstanding tenders, missing responses, or missing pleadings in preparation for mediation (1.1).	1.10	\$385.00
12/14/2023	CDY	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and update coverage chart (.2); review file regarding secondary policy evidence and add Bates stamping for production (1.1).	1.30	\$273.00
12/14/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of claimant files and claim list to reconcile claims (.6) prepare correspondence to defense counsel with request for documents (.1)	0.70	\$297.50
12/15/2023	BLW	Motion Practice: Research regarding Chubb's coverage action and motion for relief from stay (1.1).	1.10	\$687.50
12/15/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of email from defense counsel regarding new claim (.1) analyze fact sheet of claimant and documents produced to evaluate coverage (.4) prepare tender	0.70	\$297.50

		letter to carrier for new claim and prepare email to adjuster (.2)		
12/16/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate additional documents related to requests for relief from stay.	0.40	\$126.00
12/18/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Organize claimant folder (.1). Review and chart new carrier correspondence (.1).	0.30	\$63.00
12/19/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new carrier correspondence and claim number received.	0.20	\$42.00
12/19/2023	BLW	Mediation: Attend Zoom meeting with counsel regarding mediation issues (.2)	0.20	\$125.00
12/19/2023	CDY	Motion Practice: Review docket and additional briefing documents and notices for hearing on Motion for Relief from Stay.	0.30	\$63.00
12/19/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Prepare for and participate in teleconference with bankruptcy counsel Pascuzzi and Phinney.	0.50	\$212.50
12/19/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate additional pleadings in connection with bankruptcy proceedings.	1.60	\$504.00
12/20/2023	BLW	Motion Practice: Review correspondence regarding mediation issues (.2); attend Zoom conference to discuss selection of mediators and motion for release of stay (1.5); research recent court orders regarding same (.7).	2.70	\$1,687.50
12/20/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of agenda and materials regarding bankruptcy in preparation for meeting with counsel (.5) participate in teleconference with bankruptcy counsel and client (1.3) review of bankruptcy orders regarding stay issues (.3)	2.10	\$892.50
12/21/2023	BLW	Mediation: Review correspondence regarding mediation procedure (0.2).	0.20	\$125.00
12/21/2023	BLW	Motion Practice: Review pleadings regarding state court coverage action (.3); telephone conference with counsel regarding same (.2).	0.50	\$312.50
12/22/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of correspondence from Appalachian Insurance Counsel regarding outstanding claims (.1) analyze file for response to request for information (.2) review of correspondence from bankruptcy counsel (.2)	0.50	\$212.50
12/26/2023	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze additional correspondence and invoices from defense counsel (1.2); enter and incorporate additional invoices into detailed spreadsheet regarding defense fees and costs (1.9).	3.10	\$976.50
12/27/2023	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze carrier correspondence, pleadings, and files to determine if any outstanding tenders, missing responses, or missing pleadings in preparation for	0.70	\$245.00

		mediation (.7).		
12/27/2023	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of correspondence from bankruptcy counsel regarding motions, pleadings and related bankruptcy issues (.5) review of correspondence from Chubb in response to tender of claim (2)	0.70	\$297.50
12/29/2023	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new carrier correspondences and claim numbers received.	0.30	\$63.00
			Services Subtotal	\$22,106.50

Current Services			Total	
12/04/2023	Shared expense regarding Case Anywhere depository and document system access.			\$15.50
			Expenses Subtotal	\$15.50

Time Keeper	Hours	Rate	Total
Kevin Cifarelli	10.4	\$425.00	\$4,420.00
Adison Marshall	9.9	\$350.00	\$3,465.00
Barry Weinstein	7.5	\$625.00	\$4,687.50
Brian Carolus	22.4	\$210.00	\$4,704.00
Bob Patterson	13.8	\$315.00	\$4,347.00
Chuck Yeo	2.3	\$210.00	\$483.00
		Subtotal	\$22,122.00
		Total This Invoice	\$22,122.00

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AB 218 Claims

Current Services	Attorney		Hours	Total
01/02/2024	KLC	Asset Analysis and Recovery (Insurance Proceeds): Analyze pleadings and correspondence from bankruptcy counsel regarding motion for relief from stay and Debtor's agreement not to remove California Coverage action.	0.60	\$255.00
01/02/2024	KLC	Asset Analysis and Recovery (Insurance Proceeds): Analyze reimbursements from Chubb to tenders and evaluate outstanding invoices and claims for payment by Chubb.	0.60	\$255.00
01/04/2024	CDY	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review notice regarding continued hearing and update litigation calendar.	0.30	\$63.00
01/05/2024	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Analyze email and letter from Chubb in response to tender.	0.20	\$85.00
01/06/2024	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Multiple email exchanges with CY regarding additional invoices received (.2); review and analyze additional invoices and correspondence from defense counsel regarding reimbursement of invoices (.4); prepare additions to comprehensive spreadsheet, outlining invoices submitted regarding claimants (.5).	1.10	\$346.50
01/08/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review claimant folders and tender matrix	0.30	\$63.00

		claimant entries.		
01/08/2024	KLC	Asset Analysis and Recovery (Insurance Proceeds): Phone call with defense counsel billing coordinator Carillo regarding fees and reimbursement by carriers (.3) review of claims chart regarding accepted claims and payments (.3) analyze reservation of rights letter from carrier and update claims chart (.2)	0.80	\$340.00
01/08/2024	BLW	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review pleadings in Rockville bankruptcy regarding insurers' objections to plan.	0.80	\$500.00
01/09/2024	BLW	Motion Practice: Review motion for relief from stay regarding state court coverage action (.4); telephone conference with counsel regarding same (.2); prepare correspondence regarding same (.2).	0.80	\$500.00
01/09/2024	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and respond to correspondence with bankruptcy counsel regarding coverage issues and strategize regarding Committee request for documents.	0.30	\$127.50
01/09/2024	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze carrier correspondence, pleadings, and files to determine if any missing pleadings in preparation for mediation (.5)	0.50	\$175.00
01/09/2024	CDY	Fee Application: Review file and prepare draft notice regarding hourly rates.	0.80	\$168.00
01/09/2024	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Multiple email exchanges with CY regarding additional invoices received (.2); review and analyze additional invoices and correspondence from defense counsel regarding reimbursement of invoices (.4); prepare additions to comprehensive spreadsheet, outlining invoices submitted regarding claimants (1.5).	2.30	\$724.50
01/10/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new carrier correspondence and claim number received (.1). Organize claimant folder (.1).	0.20	\$42.00
01/10/2024	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze carrier correspondence, pleadings, and files to determine if any missing pleadings in preparation for mediation (2.5).	2.50	\$875.00
01/10/2024	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze additional invoices and correspondence from defense counsel regarding reimbursement of invoices (.7); prepare additions to comprehensive spreadsheet, outlining invoices submitted regarding claimants (1.4).	2.10	\$661.50
01/10/2024	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of correspondence from Chubb in response to tender of claim.	0.20	\$85.00
01/11/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and file new correspondence and pleadings.	0.10	\$21.00
01/12/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available	0.20	\$42.00

		Insurance Coverage): Review and file new correspondence and pleading received (.1). Review and chart new correspondence (.1).		
01/12/2024	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of email from Weintraub regarding Young claim; analyze adoption form from claimant Young and prepare correspondence to carriers with new pleading.	0.30	\$127.50
01/16/2024	BLW	Motion Practice: Review documents regarding motion for relief from stay (.9); attend conference with counsel to discuss same (.5).	1.40	\$875.00
01/16/2024	KLC	Asset Analysis and Recovery (Insurance Proceeds): Prepare for and participate in conference call with bankruptcy counsel Pascuzzi regarding bankruptcy and insurance issues.	0.50	\$212.50
01/19/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review claimant folders and tender matrix and coverage chart and update Tender Reconciliation List.	3.60	\$756.00
01/19/2024	KLC	Asset Analysis and Recovery (Insurance Proceeds): Review of correspondence from Chubbb regarding Sasseen claim.	0.10	\$42.50
01/19/2024	CDY	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review notice regarding additional continuance of hearing and update litigation calendar.	0.30	\$63.00
01/22/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review claimant folders and tender matrix and coverage chart and update Tender Reconciliation List (4.3631). Update tender matrix carrier data (.1). Update tender matrix table of contents (.1).	4.60	\$966.00
01/22/2024	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate additional documents and checks from Travelers regarding payments related to current claims (1.6); update reimbursement spreadsheet in connection with additional payments from Travelers (1.6).	3.20	\$1,008.00
01/22/2024	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Analyze coverage position letter from carrier and memorandum re policies in from 1963-1966.	0.30	\$127.50
01/23/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review claimant folders and tender matrix and coverage chart and update Tender Reconciliation List (6.6867). Update tender matrix carrier data (.1).	6.80	\$1,428.00
01/23/2024	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate additional documents and checks from Travelers regarding payments related to current claims (.9); update reimbursement spreadsheet in connection with additional payments from Travelers (.7).	1.60	\$504.00
01/24/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review claimant folders and tender matrix and coverage chart and update Tender Reconciliation List (6.2175). Update tender matrix carrier data (.1). Update tender matrix table of contents (.1). Review and file new correspondence received (.1).	6.60	\$1,386.00
01/24/2024	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review of email from defense counsel and	0.40	\$170.00

		analyze new complaint and potential coverage; prepare email to defense counsel regarding potential coverage.		
01/25/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review claimant folders and tender matrix and coverage chart and update Tender Reconciliation List (5.6050). Review and chart new carrier correspondence and claim number received (.2). Update tender matrix carrier data (.3). Update tender matrix table of contents (.2).	6.40	\$1,344.00
01/26/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review claimant folders and tender matrix and coverage chart and update Tender Reconciliation List (). Update tender matrix carrier data (.2). Update tender matrix table of contents (.1). Update claimant folder title (.1). Organize claimant folder (.1).	4.30	\$903.00
01/26/2024	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review, analyze, and incorporate additional documents and checks from Travelers regarding payments related to current claims (1.6); update reimbursement spreadsheet in connection with additional payments from Travelers (2.6).	4.20	\$1,323.00
01/28/2024	BLW	Discovery: Review and prepare correspondence with Creditors' coverage counsel regarding production of documents.	0.80	\$500.00
01/29/2024	KLC	Asset Analysis and Recovery (Insurance Proceeds): Review of correspondence from defense counsel; analyze new complaint and evaluate potential coverage.	0.60	\$255.00
01/29/2024	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze pleadings, coverage chart, and carrier correspondence; draft, tender notice on new 2023 claim (0.3).	0.30	\$105.00
01/30/2024	KLC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Analyze correspondence from Chubb in response to notice of claim.	0.30	\$127.50
01/30/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review claimant folder and tender matrix claimant entry and coverage chart entry (.1). Create new claimant folder (.1). Review and file new pleading to new claimant folder (.1). Create new tender matrix claimant entry (.1). Update tender matrix table of contents (.1). Create new coverage chart entry (.1). Review and chart new correspondence and claim number (.1147).	0.80	\$168.00
01/30/2024	KLC	Asset Analysis and Recovery (Insurance Proceeds): Analyze correspondence regarding mediation and coverage with carriers' counsel.	0.30	\$127.50
01/30/2024	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Multiple email exchanges with CY regarding additional invoices received (.2); review and analyze additional invoices and correspondence from defense counsel regarding reimbursement of invoices (.4); prepare additions to comprehensive spreadsheet, outlining invoices submitted regarding claimants (3.2).	3.80	\$1,197.00
01/31/2024	BSC	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and chart new tenders (.2). Review claimant folders and pleadings for new claimant data (.1075).	0.50	\$105.00

Organize claimant folder (.1).				
01/31/2024	ABM	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Review and analyze pleadings, coverage chart, and correspondence (.3); draft, revise, and send tender notices (.6); review and analyze tenders for claimant Burns (.1).	1.00	\$350.00
01/31/2024	RP	Litigation (Analysis of Coordinated Abuse Claims for Available Insurance Coverage): Multiple email exchanges with CY regarding additional invoices received (.2); review and analyze additional invoices and correspondence from defense counsel regarding reimbursement of invoices (.4); prepare additions to comprehensive spreadsheet, outlining invoices submitted regarding claimants (3.1).	3.70	\$1,165.50

Time Keeper	Hours	Rate	Total
Kevin Cifarelli	5.5	\$425.00	\$2,337.50
Adison Marshall	4.3	\$350.00	\$1,505.00
Barry Weinstein	3.8	\$625.00	\$2,375.00
Brian Carolus	34.4	\$210.00	\$7,224.00
Bob Patterson	22.0	\$315.00	\$6,930.00
Chuck Yeo	1.4	\$210.00	\$294.00
Subtotal			\$20,665.50
Total This Invoice			\$20,665.50